

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

MARTIN J. WALSH,
SECRETARY OF LABOR
U.S. DEPARTMENT OF LABOR,

Plaintiff,

v.

PACKERS SANITATION SERVICES, INC.,
LTD.,

Defendant.

No. CV: 4:22-CV-03246

**DEFENDANT’S MOTION TO QUASH
AND/OR MOTION FOR PROTECTIVE
ORDER AND FOR EXPEDITED RELIEF**

Pursuant to the Federal Rules of Civil Procedure 1, 26, 45 and NECivR 45.1 and 7.1, Defendant Packers Sanitation Services, LLC, named in the Complaint as Packers Sanitation Services, Inc., Ltd. (“PSSI” or the “Company”), moves the Court to quash the administrative Subpoena Duces Tecum (“Subpoena”) served upon a third-party after the inception of the lawsuit and without notice to PSSI, and/or enter a protective order ceasing new requests for information and documentation made to PSSI outside of formal discovery requests and ceasing issuance of further subpoenas to third-parties absent compliance with the applicable rules, and for expedited relief since the Subpoena has a response date of November 29, 2022.

WHEREFORE, for the reasons set forth in its brief in support of this motion, its index of evidence and the accompanying exhibits, PSSI respectfully requests that the Court enter an Order consistent with the relief requested in this motion.

Dated this 29th day of November, 2022.

Respectfully submitted,

/s/ Patrick M. Dalin

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